

EXHIBIT W

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

Case No. 17-CV-00454-GKF-JFJ

**DEFENDANTS' OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANTS**

Defendants, Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill" or "Defendants") hereby object and respond to Plaintiff Video Gaming Technologies, Inc.'s ("VGT" or "Plaintiff") first set of interrogatories to Castle Hill (the "Interrogatories").

OBJECTIONS TO DEFINITIONS

Defendants object to the following Definitions:

1. Defendants object to the definition of "Accused Games" with reference to games alleged in the Complaint to infringe because the Complaint fails to specifically identify which games allegedly infringe VGT's intellectual property rights. Defendants' responses will be limited to those game titles specifically enumerated in the definition.

2. Defendants object to the definition of "Award Sound Trade Dress Feature" because the Complaint fails to specifically describe which specific sounds of Plaintiff's machines are purportedly subject to trade dress protection and have allegedly been infringed, and what specific conduct by Castle Hill constitutes the alleged infringement.

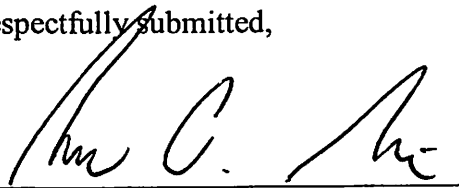
13. Describe all information, Documents, and Things in Your possession, custody, or control that (a) any Former VGT Employee brought from VGT to CHG, (b) were created by or at VGT, or (c) are the property of VGT.

OBJECTION: Castle Hill objects to this Interrogatory on the basis that Plaintiff has failed to sufficiently assert its claims in its Complaint, as set forth in Defendants' motion to dismiss, or otherwise, and discovery is premature.

ANSWER: Subject to and without waiving the objections, Castle Hill states that none of the former VGT employees were asked to bring documents with them, and Castle Hill's practice was and is to tell former VGT employees that they are prohibited from bringing to Castle Hill any documents belonging to Plaintiff.

Dated: November 22, 2017

Respectfully submitted,

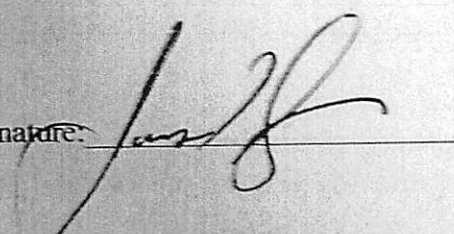


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VERIFICATION

I, Jason Sprinkle, in affiliation with Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC ("Castle Hill"), am duly authorized by Castle Hill to execute these Objections and Answers to Plaintiff's Interrogatories on its behalf. I have read the foregoing Answers and know the contents thereof. These Answers were prepared with the assistance and advice of counsel, upon whose advice I have relied. The Answers set forth herein, subject to inadvertent or undiscovered errors, are based on and therefore necessarily limited by the records and information still in existence, presently recollected and thus far discovered in the course of the preparation of these Answers. Castle Hill and I reserve the right to make any changes in these Answers if it appears at any time that omissions or errors have been made therein, or that more accurate information is available. Subject to the limitations set forth herein, I solemnly affirm under the penalties of perjury that the foregoing Answers to Plaintiff's First Set of Interrogatories are true to the best of my knowledge, information, and belief.

Signature: 

Printed Name: Jason Sprinkle

Date: November 22, 2017